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IN THE COURT OF COMMON PLEAS OF YORK COUNTY, PENNSYLVANIA

WASHINGTON TOWNSHIP
EDUCATION COALITION,

Petitioner

v.

DOVER AREA SCHOOL DISTRICT,

Respondent

: No. 2012-SU-3036-49
:
: CIVIL ACTION - LAW
:
:
:
:

For Petitioner:

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**JOINT STATEMENT OF MATTERS STIPULATED TO,
ISSUES AND PROPOSED RESOLUTION OF ISSUES**

submitted by Daniel M. Fennick, Esquire, and
Stephen S. Russell, Esquire, counsel for the parties

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NOW COME the parties to this action by and through their respective counsel, Daniel M. Fennick and Stephen S. Russell, attorneys at law, who submit this joint statement as follows:

I. **MATTERS STIPULATED TO:**

- A. The total population of Washington Township according to the most recent census is 2,673 people.
- B. There are two measures of "taxable inhabitants." The York County tax assessment records show the number of taxable inhabitants as 1,929. The school district's county *per capita* tax list shows the number of taxable inhabitants as 1,915.
- C. The petition contains 1,406 signatures.

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- D. The district believes that 55 signers do not appear on the roles of taxable inhabitants, either on the tax assessment lists or the school district county *per capita* tax list.
- E. Two individuals partially filled out the information requested in the signature form. They did not actually sign their names in the signature block (Joseph Spicer and Linda Hill).
- F. One page of the petition contains two names in the same line (Lawrence Parker and Dorothy Parker). Only one of those individuals actually signed in the signature block.
- G. Regardless of which tax list is used, the district agrees that there are a sufficient number of signatures to satisfy Petitioner's burden under Section 242.1(a).
- H. Paragraphs 1 and 2 of the Petition are admitted.
- I. Washington Township is the municipality at issue in this petition.
- J. Washington Township is contiguous with the Northern York County School District.
- K. Without conceding that the reasons are meritorious, the district agrees that the petition contains reasons for the proposed transfer within the meaning of Section 24 P.S. 2-242.1.

II. ISSUES.


- A. Issue: The district questions whether the map of Washington Township (Exhibit A) is a sufficient geographical description of Washington Township as required by Section 24 P.S. Sec. 2-242.1(a).

Proposed Resolution: Petitioners present Exhibit C, which contains a more detailed description.

- B. Issue: Has Northern York County School District been given notice of this proceeding?

Proposed Resolution: Northern York County School District was provided with a courtesy copy of the filed Petition, by regular mail, sent on September 12, 2012.

RESPECTFULLY SUBMITTED:



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